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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
Western Division**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

AMERICAN PATRIOT BRANDS,
INC., *et al.*,

Defendants.

Case No. 2:23-cv-05379-AH(BFMx)

**STIPULATION TO SET THE
TRIAL DATE AND OTHER CASE
DEADLINES**

Plaintiff Securities and Exchange Commission (the “SEC”), Defendants American Patriot Brands, Inc., Urban Pharms, LLC, DJ&S Property #1, LLC, TSL Distribution, LLC, Robert Y. Lee, Brian L. Pallas and J. Bernard Rice (the “Defendants”), and Relief Defendants Puerto Rico One Corporation, Castro Business Enterprises, LLC and Legion Accounting Services, Inc. (the “Relief Defendants”) (collectively the “Parties”), respectfully submit this Stipulation To Set the Trial Date and Other Case Deadlines.

WHEREAS, on July 19, 2023, this case was assigned to the Hon. Fernando M. Olguin, after being transferred from the District of Puerto Rico [Dkt. No. 33];

WHEREAS, between August 8, 2023 and December 4, 2024, Judge Olguin issued scheduling orders as well as an order setting forth summary judgment procedures [Dkt. Nos. 49, 50, 81, 89, 93, 97];

WHEREAS, Judge Olguin set the following deadlines for fact discovery, expert discovery, a mandatory settlement conference and motions for summary judgment:

Fact Discovery	Nov. 6, 2024 [Dkt. No. 81]
Expert Discovery	Feb. 18, 2025 [Dkt. No. 97]
Mandatory Settlement Conf.	Feb. 25, 2025 [Dkt. No. 93]
Summary Judgment Motion	Feb. 19, 2025 [Dkt. No. 81]

WHEREAS, on December 6, 2024, this case was transferred to the Hon. Anne Hwang [Dkt. No. 98];

WHEREAS, on December 20, 2024, the Court entered an Order granting the Parties' Stipulation to Set Briefing Schedule on Motion for Summary Judgment and to Vacate Other Pre-Trial and Trial Dates [Dkt. No. 104] (the "December 20 Order");

WHEREAS, the December 20 Order requires the Parties to complete the briefing on Plaintiff's anticipated motion for summary judgment by April 9, 2025;

WHEREAS, the December 20 Order vacates all future case deadlines set by Judge Olguin with the exception of expert disclosure and discovery deadlines and the deadline for the mandatory settlement conference;

WHEREAS, the December 20 Order requires the Parties to file a stipulation and proposed order suggesting trial and other dates in accordance with the

worksheet attached to the Court's Order Setting Scheduling Conference, available on the Court's webpage; and

WHEREAS, pursuant to the December 20 Order, the Parties have conferred and have agreed on a proposed trial date and other case deadlines as set forth below.

ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED, subject to Court approval, that the Court should set the following schedule for the commencement of trial and other pre-trial deadlines:

Event	Proposed Date
Jury Trial [Tuesday at 8:30 am] Estimated Duration: 12 days	10/14/2025
Final Pretrial Conference, Hearing on Motions in Limine [Wednesday at 1:30 pm]	9/24/2025
Last Date to Hear Motions [Wednesday at 1:30 pm]	5/21/2025
Trial Filings (first round) <ul style="list-style-type: none">• Motions in Limine¹• Memoranda of Contentions of Fact and Law [L.R. 16-4]• Joint Witness List• Joint Exhibit List [L.R. 16-6.1]• Joint Status Report Regarding Settlement• Requests for judicial notice	8/13/2025
Trial Filings (second round) <ul style="list-style-type: none">• Oppositions to Motions in Limine• Joint Proposed Final Pretrial Conference Order [L.R. 16-7]• Joint Agreed Upon Proposed Jury Instructions• Disputed Proposed Jury Instructions	9/3/2025

¹ Each party may file no more than five (5) motions in limine without seeking leave from the Court.

Event	Proposed Date
<ul style="list-style-type: none">• Joint Proposed Verdict Forms• Joint Proposed Statement of the Case• Proposed Voir Dire Questions, if any• Table of challenged exhibits• Deposition designations as to which the parties have any dispute or objection	

Dated: January 6, 2025

Respectfully submitted,

/s/ Eugene N. Hansen

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